ITD Public Transportation 2015-2018 Compliance Review

The Idaho Departments of Transportation (ITD), in monitoring compliance with federal requirements for subrecipients of Federal Transit Administration (FTA) funds (Sections 5309, 5310 (Rural and Small Urban), 5311, 5339 (Rural and Small Urban, as well as any other future Section funding). This Compliance Monitoring tool provides a template for ITD's Grants Officers to conducting oversight activities to document monitoring of subrecipient compliance with all State Management Review areas, as well as funds to subrecipients in small urbanized areas.

The questions included in this tool are based on FTA guidance circulars on each funding program as well as those on general grants management, civil rights, and procurement for comprehensive explanations of the requirements.

Subrecipient Compliance Review

Subrecipient Name	
Contact Person	
Phone #	
Street Address	
City, State, Zip	
Date of Visit	
Years Reviewing	

Service Type (s)	
Fixed Route	
Route Deviated	
Demand Response	
Commuter	
Other	

	5310	5311	5339	
Legal Authority and Agency Setup		X		
Program Management & Grant Administration		X		
Financial Management	X	X	X	
Procurement	X	*	X	*Any purchase of capital
Service Requirements and Restrictions		X		
Operation - Safety and Security	X	X	X	

What is the source of Federal funds received by subrecipient during the last 3 years?

_____ 5310 _____ Rural _____ Small Urban

_____ 5311 _____ Rural _____ 5311 (intercity)

_____5339 _____ Rural _____ Small Urban

_____ 5309 (SGR)

_____ Other: if other

explain:_____

Scope of Compliance Review:

Idaho Transportation Department – Public Transportation Group (ITD-PT) Compliance Monitoring Program is designed to assist public transportation providers in assessing how transit agencies in Idaho meet the varied compliance requirements required by the Federal Transit Administration and ITD-PT. The purpose of the on-site review is to assess how the agency's management is complying with Federal and state laws, rules, requirements, and regulations. The overall goal of the program is to improve the agency's compliance with applicable regulations while strengthening managements' abilities in these areas.

Issued	Description	Page #	Date Due
January	Subrecipient Desk Review – confirmation of required manuals, process, procedures to meet FTA requirements as written in circulars. (see page 5 for ITD-PT Compliance and Desk Review for list of requirements)		February 28
January	Subrecipient Website Compliance – ITD will conduct a review of each subrecipient website to ensure compliance.		February 28
January	Required yearly certifications: ✓ FFY Certification and Assurances, ✓ Debarment and Suspensions Certifications, ✓ Restrictive lobbying		February 28
February	ITD-PT will certify each subrecipient in sam.gov		February 28
February	ITD-PT will issue DAMIS letter and reporting instructions to all applicable subrecipients (5311) Subrecipients must report the previous year's MIS drug and alcohol testing results to FTA.		March 1 each year
March – September	Compliance Reviews will be conducted		
June/December	DBE reports due for anyone receiving $250,000 or more in FTA funds each year, excluding vehicle procurement (ITD-PT) works with DBE group on this reporting.		June/December

Process:

The review process kicks-off with a notification via letter from (ITD-PT) that the Subrecipient has been scheduled for a compliance review. The letter will outline the scope and parameters of the review.

In preparation for the review, some staff may be asked to be present by ITD-PT. While on-site, ITD-PT may need to interview multiple personnel at the transit system, including, but not necessarily limited to, the individuals who perform the following functions:

- Transit manager
- Governing board chair
- Advisory board chair
- Operations manager
- Customer service
- Scheduling
- Dispatch
- Maintenance manger
- Fiscal director
- Human resources director
- Procurement manager
- Training supervisor

The visit will begin with an entrance interview. During the session, ITD-PT will review the scope of the review and provide an opportunity to ask questions about the review.

Depending on the complexity of the transit system ITD-PT estimates that the site review will take between eight (8) and sixteen (16) hours.

At the conclusion of the review, an exit conference will be held. The reviewer will be prepared to discuss preliminary findings and discuss potential remedies.

At a maximum of thirty days after the site visit ITD-PT will release the draft report to Subrecipient for review.

ITD-PT Compliance and Desk Review

Starting in January 2016 and each January after that, ITD-PT will request the following Compliance Checklist information from our current and future subrecipients as part of the requirements of FTA to ensure legal, financial, and technical capacity to carry out the program. This information is due back to ITD before February 28th of each year

The checklist will be due by February 28th of each year.

Subrecipient must have updated manuals to ITD-PT by February 28th.

Document	Yes	N/A
Program Management		
Customer Complaint Process		
Employee Manual: to include, harassment, drug and alcohol policy		
Financial Management		
Subrecipients chart of accounts		
Indirect cost allocation plan and cognizant agency approval letter		
Written financial management policies and procedures		
Subrecipients Fiscal Year (Month/Year)		
Subrecipient last single audit if received over $750,000 (Federal funds in 1 year)		
Procurement		
Copies of written procurement policies (include code of conduct governing personnel involved in procurement)		
Non-accessible vehicle acquisition certification *Authorized waiver for the unavailability of lifts. Since demand response systems need not purchase accessible vehicles if they can certify equivalent service.*		
Copy of third party contracts arising from all formal procurements, (last three (3) years *(Note: if there are multiple instances of formal procurements, work with procurement SME to seek clarification on the submittals or verify that subrecipient got approval from SME on the procurement)*		
For locally conducted procurements, copies of procurement documents, including IFB, RFP, or purchase orders and vendor lists, bid tabulations, etc. (again follow above and work with SME)		
Civil Rights		
Descriptions(s) of any lawsuits or complaints alleging discrimination in service delivery filed within the last year along with statement of resolution/outcome		
Summary of all civil rights complaints, last three years		

Copy of EEO program (if the subrecipient receives more than $1,000,000 in Federal assistance or employ more than 50 employees		
Copy of DBE Program and Goals (If the subrecipient has more than $250,000 (excluding vehicle purchases) in contracting opportunities		
American with Disabilities Act (ADA)		
Complementary Paratransit plan, if applicable		
Copies of any complaints filed against the subrecipient alleging discrimination on the basis of disability in service delivery (filed within last year) along with statement of resolution/outcome		
Service brochure and other system information made available to the public		
Copy and description of fare structure employed by the subrecipient		
ADA related service and operating policies		
Use and Maintenance Project Equipment		
Vehicle fleet roster with funding sources designation, date of acquisition, accessibility status, and "designed to transport" capacity		
Transit equipment inventory		
Blank pre-trip vehicle inspection form		
Equipment/Vehicle deposition procedures		
Buy America Certifications, if applicable		
Pre-award and post-delivery audits (if applicable)		
Copies of vendor provided Bus Testing Certifications (approval page only)		
Charter and School Bus		
Copies of charter reports, last year		
Copies of contracts with all entities that purchase contract services from the system		
Volunteer Driver Program		
Volunteer Driver Policy/Procedure		

Required Questions

All ITD-PT subrecipients must be legally constituted and have a governing board, structured according to the organizational status of the agency. Governing boards, in addition to providing the legal authority to enter into an agreement with ITD-PT, must provide appropriate oversight of the financial affairs of the organization and approve all key policies of the agency (*e.g.*, procurement policies). If the governing board delegates any of these responsibilities, the reviewer should examine such delegation authority.

FTA requirements include approval actions by the governing board, for policies, plans or programs including DBE, Title VI, and Drug and Alcohol regulations.

Authority

Do officials acting on behalf of the subrecipient have the authority to do so? __ yes __ no

What is the source of that authority? (attach copy of the source) _____ Attach Copy

Who in your organization has the authority to sign documents for the agency? Were grant documents signed by that individual? __ yes __ no

Was an authorizing resolution passed by the subrecipient governing body? __ yes __ no

How does your organization participate in the coordinated public transit and human services transportation planning efforts in your district?

What efforts does your organization make to promote services or increase ridership?

Are your marketing materials published in any languages other than English?

Yes _____   No_____   Collected a sample for file _____

Do your vehicles include signage that states services available to the General Public?

Yes _____   No_____   N/A_____

ITD-PT will conduct a website review before February 28th of each year. ITD-PT will verify Compliance on the following; from the Subrecipients who are currently under any FTA funded program. Any new subrecipient who during the application process applies for FTA funds will also be reviewed to ensure compliance on their website.

Website Requirements

Web Address				
	Yes	No	N/A	Comments
Does website offer other languages?				
Fixed Route				
Fixed Route Schedule				
Fixed Route Map				
Fixed Route Phone #				
Paratransit				
Paratransit Schedule				
Paratransit Map				
Paratransit Phone #				
Demand Response Route				
Demand Response Map				
Demand Response Phone #				
Luggage Acceptance/Rule				
Bike Racks/Rules				
Public Notice/Comments				
Civil Rights/Title VI				
Customer Service/Passenger Rules				
Board Members				
Business Contacts				

ITD-PT will send the following forms out to existing and potential new subrecipients each year during the month of January: Certification and Assurances, Debarment and Suspensions Certifications, Restrictive lobbying– Subrecipient must sign and send back by February 28th. ITD-PT will verify sam.gov

Document	Date Issued	Date Signed by Subrecipient	ITD-PT has filed Location	Comments
Certifications and Assurance (Year)				
Debarment and Suspensions Certification				
Restriction on Lobbying				
Copy of Subrecipient verification www.sam.gov	Date Verified	N/A		

On-Site Compliance Review

Table of Contents

PROGRAM MANAGEMENT

Any subrecipient who receives FTA funds is considered a pass-through agency, eligible and authorized to receive FTA funds. ITD-PT has determined through the planning and grant award process the subrecipient was and is eligible for past as well as current funds. Therefore ITD-PT does not need to verify eligibility or eligible services. If upon review of the scope of the services it is determined that the described services vary from that outlined in the project application and/or as described in scope of work or grant agreement, this will be reported as a finding.

For the list of the last 3 years of funding ITD-PT has identified those funds in the following page.

In this section we will review:

- ✓ Grant Management procedures
- ✓ Control Environment
- ✓ Reporting
    - ▪ Milestones
    - ▪ NTD
    - ▪ DBE
- ✓ Closeout of Grant/Project
- ✓ Technical Capacity to complete the Scope of Work
    - ▪ Service Eligibility

List of Funding for last 3 years from: Month/Yr to Month/Yr

Subrecipient Name: _____

Year of Funding: Month, Day, Year to Month, Day, Year

Grant ID	Grant #	Total Award	Purchase of Service (5310) only	Project Admin	Operating	PM	Capital	MM
5311	ID18X0XX	$	N/A	$	$	$	$	$
TOTAL FUNDED								

Year of Funding: Month, Day, Year to Month, Day, Year

Grant ID	Grant #	Total Award	Purchase of Service (5310) only	Project Admin	Operating	PM	Capital	MM
5311	ID18X0XX	$	N/A	$	$	$	$	$
TOTAL FUNDED								

Year of Funding: Month, Day, Year to Month, Day, Year

Grant ID	Grant #	Total Award	Purchase of Service (5310) only	Project Admin	Operating	PM	Capital	MM
5311	ID18X0XX	$	N/A	$	$	$	$	$
TOTAL FUNDED								

Note: if over $750,000 in federal funds 2 CFR200 requires a single audit due within 6 months of subrecipient FY is complete.

BASIC REQUIREMENT: The state must certify to FTA that it will comply with applicable federal requirements and that each local subrecipient has met all statutory and program requirements before expending federal funds on a local project. The state must develop and implement grant management procedures to track and report on the progress of projects, expend grant funds in a timely manner, and close out local projects and grants when project activity is completed.

Typical Source	? #	Question
Subrecipient Grant Management Manual and/or employee manual	1	**Grant Management Procedures –** What are the subrecipient's procedures for managing the FTA grants?
	2	Who is responsible for various grant administration functions (e.g. report preparation, submission etc.)?
On Site Review Employee Job Descriptions Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed?	3	Are agency employees skilled and trained to perform the duties associated with their particular job functions (e.g., daily management of staff, accounting functions, delivery of services? Yes No ☐ ☐ *Discuss process of different job skills and have the employee(s) walk through the process and how often they are trained?* *Review required training(s) of employees and look for current certifications and if tracking when expire* *Pick several employees and walk through process(s) Have employee walk through job function to ensure understanding of duties* *Employee Name:* *Job Title* *Employee Name:* *Job Title*
Timeline	4	How often does employer go over employee manual and other safety requirements to ensure employee is doing job correctly?
Date Resolved?		ITD-PT Notes:

Typical Source	? #	Question

Review ITD Reporting for on time reports
 	
Subrecipient Grant Management Manual on reporting
 	
On Site Review
 	
Subrecipients reporting/tracking sheets
	5	**Status Reports** - Has the subrecipient submitted an annual status report (or a full year's worth of monthly/quarter reports) for each active Section 5310, 5311 or any other grants by the deadline required by the State for its Oct. 31 submittal to FTA?
		
		Yes ☐ No ☐
		
		Do the reports include the required program measures? Yes ☐ No ☐
		
		   Review reporting and ensure that subrecipient is reporting as needed. If not address as a finding
		
		Review 2 months of reporting:
		   Pick 2 months and ask Subrecipient to supply all documentation for the reporting month
		   Total ridership for the month and compare to what was reported for the month.

Desk Review Finding(s) On-Site Finding(s)	6	**Milestone/Progress Reports** - Has the subrecipient submitted Milestone/Progress Reports for Section 5307 and 5309 grants at the required intervals (quarterly or annually) and on time? Yes ☐ No ☐ Do the reports contain the required information? Yes ☐ No ☐ *Note:* For all 5309 and 5339 facilities projects State submits quarterly to FTA. For all other, State submits annually to FTA by Oct. 30. Operating assistance: estimated and actual date when funding has been expended. Other types of assistance: • Discussion of budget or schedule changes • Status of milestones • Reasons milestones not met Discussion of unforeseen events that have affected project schedule, cost, or purpose
Corrective Action Needed? Timeline Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Review ITD Reporting for on time reports Subrecipient Grant Management Manual on reporting On Site Review Subrecipients reporting/tracking sheets	7	**National Transit Database** (NTD) - Has the subrecipient submitted data for the Section 5311 program to the National Transit Database (NTD) or the state? Yes ☐ No ☐ *Note:* Items to be reported include total annual revenue; sources of revenue; total annual operating costs; total annual capital costs; fleet size and type and related facilities; revenue vehicle miles; and ridership. Were its reports submitted on time? Yes ☐ No ☐ Review the current status of the grantee's NTD reports for the past three years? Any issues?
Desk Review Finding(s)	8	**Grant Close-Out –** Are any open grants inactive? Yes ☐ No ☐ Are projects on schedule? Yes ☐ No ☐ If no explain?
On-Site Finding(s)	9	Reviewing Subrecipients manuals required and will be due by February 28th of each year. 1. Is the subrecipient following policy and procedures to manage the funding awarded? 2. From review of manuals, website and above questions is the subrecipient carrying out Scope of Work awarded and was awarded in the past 2 years?
Corrective Action Needed? Timeline	10	Is the subrecipient providing any services outside of the scope of work such as Meal Delivery? Yes ☐ No ☐ If yes please explain?
Date Resolved?		**ITD-PT Notes:**

FINANCIAL MANAGEMENT (5307/5311Subrecipients)

All subrecipients are required to establish and maintain an accounting system to which all transportation-related costs, and revenues, are recorded. These costs and revenues must be clearly identified, easily traced and substantially documented. The full allocated cost of the public transportation program must be clearly identified regardless of the operational nature of the agency.

ITD-PT funds subrecipients through an application process. Funding agreements are then issued to perform the specified scope of work. The executed funding agreement establishes a partnership between ITD-PT and the pass-through subrecipient wherein ITD-PT assumes an oversight role in the use of the grant funds and retains a vested interest in the unused grant balances, improperly applied funds, and property and/or facilities purchased or otherwise acquired under the grant. Subrecipients who then pass through to: lower tier operators and third party contractors are responsible for establishing and maintaining adequate internal control over all their functions that relate to project administration and execution of the project. These control systems must adhere to: applicable Federal requirements outlined in the Common Rule (49 CFR part 18 and 49 CFR part 19), program specific program guidance contained in State Management Plan and appropriate FTA Circular, and other requirements as may be established by ITD-PT

Both 2 CFR part 225 (formerly OMB Circular A-87), Cost Principles for State, Local, and Indian Tribal Governments, and 2 CFR part 230 (formerly OMB Circular A-122), Cost Principles for Nonprofit Organizations, indicate that reports reflecting the distribution of activity of each employee must be maintained of all staff members whose compensation is charged, in whole or in part, directly to (a grant) award. Additionally, the report must reflect an after-the-fact determination of actual activity of each employee. Budget estimates (i.e., estimates determined before the services are performed) do not qualify as support for charges to (grant) awards. The use of percentage time allocations of staff in their charges of time is not permissible under the cost principles of either local government or nonprofit organizations. Time charged to any Federal award must:

- Reflect after-the-fact determination of actual activity;
- Account for the total activity of the employee;
- Be signed by the individual employee; and
- Be prepared at least monthly and coincide with one or more pay periods.

Financial records, supporting documentation, and all other records pertinent to a grant must be retained by the subrecipient and/or any pass-through to third party and must be made readily available to authorized representatives including ITD-PT, for a period of three years from the date of project completion and final payment under the agreement has been rendered. ITD-PT will issue a close out letter to subrecipient after final invoice for the funding period is paid.

Only for Subrecipients of 5307/5311 funds: If no skip to #13

Typical Source	? #	Question
Chart of accounts Monthly billing and any issues	11	Is the subrecipient chart of accounts sufficiently detailed to accumulate project revenues and expenses in detail? Review Subrecipient financial management manual and understand process and how subrecipient is able to separate total cost for 5307 from 5311. Walk through process of an invoice and how to determine if expenditure is 5307 or 5311
Desk Review Finding(s)	12	Is the chart of accounts sufficiently detail and/or distinguish between project capital and operating for (5307/5311) Is the accounting system capable for generating reports to ensure timely collection of revenues and grant receipts? Are the personnel responsible for recording financial transactions, generating reports, and ensuring the accuracy of financial data suitably trained to perform these functions? Yes ☐ No ☐
On-Site Finding(s)	13	How are you adhering to the required three (3) year of retained records?
Corrective Action Needed? Timeline	14	Federal cost principles require that all costs incurred under a grant must be "reasonable and necessary." Does the pass-through agency have a process in place to determine reasonable and necessary costs prior to making the expenditure? Yes ☐ No ☐ If yes - what are these procedures?
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Review Financial Manual If third party review process/procedure Talk through process(s)	15	Explain how you ensure that costs claimed under a Federal grant award are not included as a cost or used to meet cost sharing or matching requirements of any other Federally- financed program in either the current or a prior period?

Desk Review
 	
Finding(s)
 	
On-Site Finding(s)
	16	Do the subrecipient's financial records support the requests for funds?
		
		   Review several months of collected billing records and ensure total all backup supports the total expenditures for the month of request (Admin/OP/PM) 5311 (before you go to site)
		
		   Ask subrecipient for 5307 expenditures for the same month you reviewed your 5311 records to ensure no duplications.
		
		Does the subrecipient use FTA capital funds to support ADA Paratransit operating costs? Yes N☐ ☐
		
		   If yes, is no more than 10% of annual formula apportionment of 5307 funds being used for this purpose?
		Yes ☐No ☐

Corrective Action Needed?
 	
Timeline
	17	Do you pass through to a third party? Yes ☐o ☐
		
		 If yes how do you monitor the third party?
		
		   Ask for a documented process
		   Ask subrecipient to walk through the process to monitor third party?

Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
	18	**Financial Capacity/Local Match –**
		Does the subrecipient have available the designated local matching and operating funds? Yes ☐ No ☐
Desk Review Finding(s)		What are the sources of these funds? *(This list is supplied at the budget set up stage) take copy of listed match sources to verify funding.*
		Are only non-DOT funds are used as local match? Yes ☐ No ☐
On-Site Finding(s)		In the next few years, do you anticipate any changes in levels of local funds for transit? Yes ☐ No ☐
Corrective Action Needed?		What is the subrecipients current financial condition? (Example: do they call to find out when payments will be processed as soon as submitted?) Yes ☐ No ☐
Timeline		If yes ask how subrecipient is working towards a financial plan to be more sustainable for example 3-6 months cash reserve.
		Do they have a multi-year financial plan? Yes ☐ No ☐
		Does the subrecipient fully document volunteered services or in-kind revenue used as local match? Yes ☐ No ☐
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Review descriptive portions of application, audits, reviews of accounting or financial management systems Work with Internal Review Staff	19	**Financial Management System** - Does the subrecipient have the financial management system to carry out the programs and to receive and disburse Federal funds? Yes ☐ No ☐ *Note:* States are only required to monitor this for subrecipients that receive Federal cash. (e.g. the State does not have to ensure that Section 5310 subrecipients for which the State procures vehicles have such a financial management system.
Desk Review Finding(s)	20	Does the subrecipient use a cost allocation plan for indirect administrative costs? Yes ☐ No ☐ If yes, is the indirect cost allocation calculated and adjusted annually? Yes ☐ No ☐ Have procedures been established to assure costs are classified as either direct or indirect (but not both)? __ yes __ no
On-Site Finding(s) Corrective Action Needed? Timeline	21	*Note*: If subrecipient received over $750,000 in Federal funds in any year, an A-133 annual single audit must be conducted within 6 months of FY end. 30 Days after completion subrecipient must send copy to ITD-PT. Does this subrecipient receive over $750,000 in federal funds in any year? Yes ☐ No ☐ When was the subrecipient last annual audit? Does ITD-PT have a copy on file? Yes ☐ No ☐ If no subrecipient will need to supply copy and review for any findings. Did you have any findings? Yes ☐ No ☐ If yes Have they been resolved? Yes ☐ No ☐
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Financial Manual Question # 22	22	Applicable Office of Management and Budget (OMB) cost principles, as stated in 2 CFR parts 225 and 230, agency program regulations, and the terms of grant and funding agreements will be followed in determining the allowable allocation of costs. **The following questions are for Director and/or Financial Personnel**
Desk Review Finding(s)		Accounting records must be supported by such source documentation as cancelled checks, paid bills, payrolls, time and attendance records, contracts, and third party award documents. How is the budget developed?
On-Site Finding(s)		
Corrective Action Needed?		Who is responsible for developing the budget?
Timeline		Who approves the budget? Who is responsible for ensuring that costs are consistent with the project budget and the limitations set forth in the grant agreement?
Date Resolved?		**ITD-PT Notes:**

PROCUREMENT

BASIC REQUIREMENT: When procuring supplies, equipment, or services using FTA funds, the state or Subrecipients can follow the same policies and procedures it uses for procurements with non-federal funds but must will comply with the following statutory and administrative requirements:

- Conduct all procurements in a manner providing full and open competition
- Exclude the use of statutorily or administratively imposed in-state or local geographical preferences in the evaluation of bids or proposals except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference
- Do not enter into any contract for rolling stock with a period of performance exceeding five years inclusive of options without prior FTA approval
- Ensure that every purchase order and contract executed using Federal funds includes all applicable clauses required by Federal statutes and executive orders and their implementing regulations.
- Use competitive proposal procedures based on the Brooks Act when contracting for architectural and engineering services if the state has not adopted a statute governing the procurement of such services
- Award to only responsible contractors processing the ability, willingness and integrity to perform successfully under the terms and conditions of the contract.

Subrecipients comply with state requirements. In addition, Subrecipients that are public entities must comply with FTA requirements that apply to states and Subrecipients that are private nonprofit or for-profit entities must comply with all the FTA requirements contained in FTA C 4220.1F. Each state is responsible for making these organizations aware of their requirements.

FTA's third party procurement (C4220.1F) resource: http://www.fta.dot.gov/legislation_law/12349_8641.html

National RTAP resource: Procurement Pro: http://www.nationalrtap.org/webapps/procurementpro.aspx

IDAHO PURCHASING THRESHOLD		
$1 TO $3000 MICROPURCHASE	**$3,001 TO $99,999 SMALL PURCHASE**	**$100,000 AND ABOVE FORMAL SOLICITATION**
Shall show that paid fair and reasonable amount for product**.**	Shall obtain a minimum of three (3) quotes/bids	Shall Follow State of Idaho Rules: http://purchasing.idaho.gov/idaho code.html • Sealed bids required

*Procurement Process - Subrecipients use their own procurement procedures that reflect applicable Federal, state, and local laws and regulations, provided that the process ensures competitive procurement and that the procurement conforms to applicable Federal law including 49 CFR Part 18, specifically Section 18.36 and FTA Circular 4220.1F "Third Party Contracting Guidelines." http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/03_DOTComRul_49CFR18.html#C_2

Idaho Administrative Code, Rules of the Division of Purchasing covered in IDAPA 38.05.01. http://adminrules.idaho.gov/rules/current/38/0501.pdf

ITD-PT passes through and will ensure that all procurement complies with State of Idaho Code *(link below under formal solicitation)* and FTA standards found in Circular 4220 – the Common Rule

ITD-PT will offer standard templates for procurements as follows:

3 Quotes – this can be via phone, email, and internet(suggest always get 3 quotes $500 to $3,000)

Request for Quote (RFQ) – suggest use for $3,001 to $99,999

Typical Source	? #	Question
Review subrecipient agreements, procurement documents, written record of procurement history, procurement review if any	23	**Procurement Standards and Procedures** – Does the subrecipient have procurement procedures that reflect applicable state and local laws and also conform to federal law, including: {checklist table below}
Desk Review Finding(s)		
On-Site Finding(s)		
Corrective Action Needed?		
Timeline		
Date Resolved?		**ITD-PT Notes:**

Checklist sub-table (within question 23):

Checklist	Yes	No
written code of standards of conduct		
review procedures that avoid purchase of unnecessary or duplicative items		
written record of procurement history (this would include market analysis – closeout of award)		
written procedures for handling and resolving protests		
written selection procedures		
no contracts for rolling stock and replacement parts exceeding five years inclusive of options		
contract cost or price analysis for every procurement		
written protest procedures		
contract administration process		
contract issues/dispute settlement procedures		
Is the documentation of quotes, price sheet, etc., being kept for three years?		
Conflict of Interest - Do any potential conflicts of interest exist between policy board members/ employees and consultants/ vendors/ suppliers or between a management contractor and consultants/vendors/ suppliers?		

Typical Source	? #	Question

Review subrecipient agreements, procurement documents, written record of procurement history
 	
Review of written policies and procedures, selected procurements
 	
Desk Review Finding(s)
	24	**Full and Open Competition** - How does the subrecipient allow for full and open competition for all transactions under the following methods of procurement?
		
		  Have subrecipient explain the process for Micro/Small Purchase, Sealed Bid
		
		• Micro-Purchases ($3,000 or less)
		• Small Purchases (more than $3,000 but not more than $100,000)
		
		  Below list is anything over $100,000
		• Sealed Bids/Invitation for Bid (IFB)
		• Competitive Proposals/Request for Proposals (RFP)
		• Architectural and Engineering Services (A&E)
		• Revenue Contracts
		
		Has the grantee improperly imposed geographic preferences, except when contracting for A&E services based on the Brooks Act?

On-Site Finding(s)		
Corrective Action Needed? Timeline	25	**In the last 3 years have you "Piggy Backed" on any other contract? Yes ☐ No ☐** **If yes – just make a note for now will need to address more later.** **Remind Subrecipients that Idaho is no longer allowing for any type of Piggy Back.**
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Review subrecipient procurement documents Questions to the subrecipient	26	**Third Party Procurements** - Have applicable FTA clauses been included in federally funded capital and/or operating procurements exceeding the micro-purchase limit (except construction contracts over $2,000)? Yes ☐ No ☐ Do solicitations for ITS related projects include a specific requirement for conformance with the National ITS Architecture? (ITD-PT is no more restrictive then this)
Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	27	**Altoona Testing –** Has a subrecipient purchased vehicles subject to the bus testing requirement? Yes ☐ No ☐ If no go to 28 If yes, did the models require testing? Yes ☐ No ☐ Explain how this was determined? If required, was a model tested? Yes ☐ No ☐ Was a report issued? Yes ☐ No ☐ If models did not require testing, does the subrecipient have a certification from the manufacturer that the vehicle does not need to be tested? Yes ☐ No ☐ Collect copy of this ☐
Date Resolved?		**ITD-PT Notes:**

PROCUREMENT - DISADVANTAGED BUSINESS ENTERPRISE

BASIC REQUIREMENT: Subrecipients must comply with the policy of US DOT that DBEs are ensured non-discrimination in the award and administration of DOT-assisted contacts. Subrecipients must create a level playing field on with DBEs can compete fairly for DOT-assisted contracts; ensure that only firms that fully meet eligibility standards are permitted to participate as DBEs; help remove barriers to the participation of DBEs; and assist the development of firms that can compete successfully in the marketplace outside the DBE program.

Typical Source	? #	Question
Review organization chart, procurement policies and procedures, selected procurements	28	**DBE Program Threshold** - Does the subrecipient receive more than $250,000 of FTA funds in prime contracts in a federal fiscal year, exclusive of transit vehicle purchases? Yes ☐ No ☐ If No go to #30 If yes, did the subrecipient submit a DBE program to FTA? Yes ☐ No ☐ If yes, has the DBE program been approved by FTA? Yes ☐ No ☐
Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	29	**DBE Program Characteristics** *Note:* If the subrecipient is required to submit a DBE program to FTA (if they are awarded more than $250,000 of FTA funds in a federal fiscal year), a written DBE program is required. Do you have third party contracts? Yes ☐ No ☐ (if no go to #30) Explain how you monitor third party contracts to ensure that DBE obligations How frequently does the subrecipient conduct site visits to observe that DBEs are actually performing the work on contracts? Does the subrecipient check payroll records to ensure that employees working on the job are actually employees of the DBE and not the prime contractor?
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Ask Subrecipient Questions	30	**Have you purchased a vehicle in the past 3 years? Yes** ☐ **No** ☐ **(if no go to #31)** **If yes: Vehicle Procurements** - For procurements of transit vehicles (e.g., buses, railcars, vans) during the past three years, did the subrecipient obtain DBE certifications from the transit vehicle manufacturers (TVM) with the bids/proposals submitted? Yes ☐ No ☐ Collect copy of the certification ☐
On-Site Finding(s) Corrective Action Needed? Timeline	31	**Complaints –** Have you receive any complaints alleging that you did not comply with the DBE regulations in the past three years? Yes ☐ No ☐ What is your process for handling and resolving such complaints? Do the complaints indicate any problems with the DBE program? Yes ☐ No ☐ *If yes explain* Do you have any pending complaints? Yes ☐ No ☐ *If yes explain* If yes what is the status of complaints?
Date Resolved?		**ITD-PT Notes:**

PROCUREMENT - BUY AMERICA

BASIC REQUIREMENT: Per FTA's "Buy America" requirements, Federal funds may not be obligated unless steel, iron, and manufactured products used in FTA funded projects are produced in the United States, unless FTA has granted a waiver or the product is subject to a general waiver. Rolling stock must have sixty percent domestic content and final assembly must take place in the United States. Grantees must conduct a pre-award and post-delivery audit for all purchases of rolling stock in order to verify that the 60 percent domestic content and final assembly requirements were met.

Typical Source	? #	Question
Procurement solicitation documents Third-party contracts Review monthly invoices that would lead to a procurement	32	**Threshold and Provision** - Has subrecipient had any procurements which exceeded $100,000 in the past year? Yes ☐ No ☐ If Yes, show where you included a "Buy America" provision in all capital and operating procurements of steel, iron, and manufactured products in excess of $100,000? *Review RFP(s) for compliance* Did you requested, acquired, and retained "Buy America" certifications from vendors? Yes ☐ No ☐
Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	33	Have you purchased buses or other rolling stock with FTA funds in the past three years? Yes ☐ No ☐ (if no go on to #34) If yes How many? [ ] If over 10 buses in a single order, was a in-plant inspection done during the manufacturing process? If you scheduled multiple delivery dates show where you performed and certified a pre-award and post deliver for each group of vehicles before placing them into service? Did subrecipient conduct pre-award and post-delivery audits for its purchase of rolling stock over $100,000? Yes ☐ No ☐ Show me your properly completed pre-award and post-delivery certifications in its contract files? Yes ☐ No ☐
Date Resolved?		**ITD-PT Notes:**

TITLE VI

BASIC REQUIREMENT: Subrecipients must ensure that no person in the United States shall on the grounds of race, color, creed, national origin, sex, age, or disability be excluded from participating in, denied the benefits of, or be subject to discrimination under any project, program, or activity funded in whole or in part by FTA. The state must document how it meets federal Title VI requirements and monitors subrecipient compliance with these requirements in the state management plan. The state must ensure that they and their subrecipients comply with Title VI requirements:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations
- Promote the full and fair participation of all affected populations in transportation decision-making
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations
- Ensure meaningful access to programs and activities by persons with limited English proficiency

Typical Source	? #	Question
Review Title VI program Review public outreach documentation, including how any concerns expressed by the community were addressed Subrecipient Website	34	**Responsibility –** Who within the subrecipient's organization is responsible for ensuring that Title VI obligations are fulfilled? Who prepares Title VI reports? How does subrecipient monitor compliance of contractors, if any? How do you ensure that the Title VI obligations are fulfilled If you report who prepares the Title VI report? How do you monitor compliance of your third party?
Desk Review Finding(s)	35	**Public Outreach –** Has the subrecipient sought out and considered the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities?
On-Site Finding(s)	36	**Limited English Proficiency –** What steps have you taken to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP)? *Note*: Subrecipient must determine steps are necessary to provide "meaningful access" based on a four-factor analysis and develop language implementation plan to include (1) identifying people who need language assistance; (2) developing language assistance measures; (3) training staff; (4) providing notice to LEP persons; and (5) monitoring and updating the plan.
Corrective Action Needed? Timeline	37	**Notification of Rights –** How do you notify customers of their rights under Title VI? How is such notification provided to the public?
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Review written complaint procedures, complaint documentation to verify that procedures are followed	38	**Procedures for Investigating and Tracking** Title VI Complaints What are your procedures for investigating and tracking Title VI complaints? Is this information made available to the public upon request? Yes ☐ No ☐ *Note*: May be same procedures already established for other types of complaints; needs to identify complaints filed due to belief of discrimination on the grounds of race, color, or national origin (even though complainant may not refer to Title VI in the complaint)
Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	39	**Record of Investigations, Complaints and Lawsuits** on Title VI How do or would you maintain a record of Title VI investigations, complaints and lawsuits filed with the agency?
Date Resolved?		**ITD-PT Notes:**

PUBLIC COMMENT PROCESS FOR FARE INCREASES AND SERVICE REDUCTIONS

BASIC REQUIREMENT: The subrecipient who receives FTA funds must have a written process to solicit and consider public comment before raising a fare or carrying out a major reduction of transportation services.

Typical Source	? #	Question
Review procedures that describe the public participation process and define a major service reduction (may be a separate stand-alone document or part of a larger set of administrative procedures)	40	How are these procedures documented? What does the subrecipient consider to be a "major" service reduction? How would you consider the comments in the decision-making process?
Desk Review Finding(s)		Have you raised a fare and/or carried out a major reduction in service in the past three years? Yes ☐ No ☐
On-Site Finding(s)		If yes review documentation to ensure followed written process.
Corrective Action Needed?		
Timeline		*Note:* For service decreases, the requirement applies to "major service reductions" only (as stabled by grantee), such as: • elimination of a route; • reduction of "X" percent of service hours of a route; and/or elimination of one or more stops on a route.
Date Resolved?		**ITD-PT Notes:**

SERVICE REQUIREMENTS AND RESTRICTIONS
ADA/Charter Bus/School Bus

ADA

BASIC REQUIREMENT: Titles II and III of the Americans with Disabilities Act of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

Note: The requirements for public entities or private entities differ. FTA has determined that all Section 5311 subrecipients, including private entities, must comply with the requirements for public entities for ADA complementary paratransit service as they operate "in the shoes" of the state. Section 5309, 5310, 5316, and 5317 subrecipients that also receive Section 5311 assistance, even those that are private entities, must also comply with the requirements for public entities. Section 5309, 5310, 5316, and 5317 subrecipients that are private entities comply with the requirements for private entities. Please note that all recipients of Section 5307 assistance are public entities.

Typical Source	? #	Question		
Review operating policies and procedures, conduct spot-checks of accessibility features of in-service vehicles, ride a fixed route and listen for on-board announcements	41	**General Service Provisions –** The following questions will show compliance with the ADA- required service provisions?		

General Service Provisions (Question 41)

Question	Yes	No
Maintenance of accessible features		
Procedures to ensure lift availability		
Lift and securement use		
Announcements on vehicles		
Vehicle identification mechanisms		
Service animals		
Use of accessibility features		
Public information/ communications		
Lift deployment at any designated stop		
Service to persons using respirators or portable oxygen		
Adequate time for boarding/ disembarking		
Training to proficiency on use of equipment/sensitivity/ assistance		

Typical Source	? #	Question
Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	42	**Do you provide fixed route services?** **How do you provide complementary Paratransit? Deviated Fixed Route** ☐ **or Complementary Paratransit** ☐ **Review subrecipients** current ADA transit plan? How do you comply with ADA transit requirements?

Question	Yes	No
Do you provide service to: Ada eligible individuals		
A Personal Care Attendant (PCA)		
Do you charge a fare for (PCA)?		
A companion		
Visitors policy adhered to properly		
Do you describe the type of service? Door to door or curb to curb or other?		
Service is within ¾ mile corridors of fixed routes and the core area? How do you handle service requests that are beyond the ¾ mile corridor and core area?		
Next day service provided? *Ensure website has changed from 24 hour notice to Next service day*		

		Do you allow for next day reservations?		
		Are advanced reservations beyond the next day required (this does not include subscription services)		
		Are requests for reservations accepted during normal business hours on all days prior to days of service (e.g. weekends, holidays, even if the administrative office is closed)?		
		Are trips scheduled within one hour of the requested trip time?		
		Are fares no more than twice the fixed route fare?		
		Are there no priorities based on trip purposes?		
		Is ADA Complementary Paratransit available during the same hours and days as fixed route?		
		Does subscription service not exceed 50 percent unless there is non-subscription capacity		
		How does subrecipient monitor ADA complementary paratransit to ensure no pattern or practice of trip denials, missed trips, excessively long trips, late trips		
		What is standard for telephone hold time?		
		What is the phone number to schedule a ride?		
		ITD-PT test this by calling the line to ensure subrecipient meets it		
		What is your no-show policy		
		Does appeal process conform to ADA requirements?		
		Are eligibility decisions made within 21 days of completed application?		
		If no, is presumptive eligibility granted?		
		Explain your eligibility process?		
	43	Have you acquired vehicles that are not accessible? Yes ☐ No ☐		
Date Resolved?		**ITD-PT Notes:**		

Typical Source	? #	Question
Review procurement documents for new or altered facilities for ADA compliance language While on-site, examine facilities for potential barriers to accessibility While on-site, conduct spot-checks of any bus stops with recent new construction	44	**Facilities –** If the subrecipient provides general public transportation service, are the facilities accessible? Yes ☐ No ☐ Has the subrecipient constructed any new facilities or altered any existing facilities used for providing designated public transportation regardless of the source of FTA funds? Yes ☐ No ☐ Do contracts related to such changes include reference to ADA requirements? Yes ☐ No ☐
Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	45	Do you have a procedure for responding to and tracking complaints? Yes ☐ No ☐ Who handles the complaints? Do these procedures apply to all modes, including complementary paratransit? Yes ☐ No ☐ Has the subrecipient received any complaints of discrimination due to disability? Yes ☐ No ☐ If yes, what is the status of the complaints? Are there any lawsuits alleging discrimination on the basis of disability? Yes ☐ No ☐ *Note*: These questions are for information only. Complaints or legal actions may indicate a problem with implementation of ADA requirements. Requiring subrecipients to notify the state of any complaints may be part of the state's oversight program. The FTA Office of Civil Rights should be advised of any pending lawsuits.
Date Resolved?		**ITD-PT Notes:**

CHARTER BUS

BASIC REQUIREMENT: FTA grantees are prohibited from using federally funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. The prohibition applies to recipients of Section 5307, 5309, 5310, 5311, 5316, and 5317 assistance. Grantees are allowed to operate community based charter services exempted under the regulations; some irregular or limited duration services; and those that are covered by exceptions. FTA Charter Bus Service Regulations -- http://www.fta.dot.gov/laws/leg_reg_179.html

''Charter service'' means, but does not include demand response service to individuals: Transportation provided by a recipient at the request of a third party for the exclusive use of a bus or van for a negotiated price. The following features may be characteristic of charter service:

- A third party pays the transit provider a negotiated price for the group

- Any fares charged to individual members of the group are collected by a third party

- The service is not part of the transit provider's regularly scheduled service, or is offered for a limited period of time

- A third party determines the origin and destination of the trip as well as scheduling

- Transportation provided by a recipient to the public for events or

- functions that occur on an irregular basis or for a limited duration and

- A premium fare is charged that is greater than the usual or customary fixed route fare

- The service is paid for in whole or in part by a third party.

All FTA Grantee's and pass through subrecipients are prohibited from providing charter service using FTA-funded equipment unless allowed under an exemption.   (See allowable in Questions #46)

Typical Source	? #	Question
Question Review manuals and public information brochures, website Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	46	Do you or your contractors provide any service to the public for events or functions that occur on an irregular basis? Yes ☐ No ☐ If no go to #47 If yes, explain ITD-PT (does the service fall under one or more of the allowed exceptions listed below? Yes ☐ No ☐ ITD-PT requires any subrecipient wishing to provide charter service to comply with the procedures in the Final Rule on Charter Service. ITD-PT must be notified via email or postal service that a request for charter service exception is being submitted to FTA accompanied with all supporting documentation. Services that do not meet the definition of charter service and, therefore, are not considered charter service by FTA are: 1. Service requested by a third party that is irregular or on a limited basis for an exclusive group of individuals and the grantee does not charge a premium fare for the service and there is no third party paying for the service in whole or in part 2. Shuttle service for a one-time event if the service is open to the public, the itinerary is determined by the grantee, the grantee charges its customary fixed route fare and there is no third party involvement. 3. When a university pays the grantee a fixed charge to allow all faculty, staff, and students to ride the transit system for free so long as the grantee provides the service on a regular basis along a fixed route and the service is open to the public. 4. When the grantee sees a need and wants to provide service for a limited duration at the customary fixed route fare. Also see SMP under Charter for Exceptions
Date Resolved?		**ITD-PT Notes:**

SCHOOL BUS

BASIC REQUIREMENT: Subrecipients are prohibited from providing exclusive school bus service unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service. School tripper service that operates and looks like all other regular service is allowed. FTA School Bus Operations -http://www.fta.dot.gov/laws/leg_reg_181.html

Typical Source	? #	Question
	47	Do you operate exclusive school bus service? Yes [ ] No [ ] (if no go to #48)
		If yes please explain your service?
		Allowable: **School Tripper Service.**
		Grantees are permitted to provide school tripper service to accommodate the needs of school students and personnel. The school bus regulation defines school tripper service as regularly scheduled mass transportation service that is open to the public and is designed or modified to accommodate the needs of school students and personnel. It may involve the use of various fare collections or subsidy systems.
Desk Review Finding(s)		Buses used in tripper service must:
On-Site Finding(s)		• Be open to the public.
Corrective Action Needed?		• Not carry designations such as "school bus" or "school special."
Timeline		
Date Resolved?		**ITD-PT Notes:**

OPERATIONS/SAFETY AND SECURITY

Satisfactory Continuing Control/Maintenance/Safety and Security

SATISFACTORY CONTINUING CONTROL

BASIC REQUIREMENT: Local grantees must maintain control over federally funded facilities and equipment and ensure that they are used in transit service. Under the Common Rule, the state uses, manages, and disposes of equipment under its own laws and procedures.

Typical Source	? #	Question
Ask questions and inspect property	48	Do you use any real property for incidental use?　　Yes ☐　No ☐　(if no go to #49) 　Does the local grantee make incidental use of any real property? __ yes __ no 　*If yes*, was the State informed?　Yes ☐　　No ☐ 　Did the grantee obtain approval from the state?　Yes ☐　No ☐ 　ITD-PT must have approval letter on file from FTA　Yes ☐　No ☐ Do you maintain continuing control over the property? Yes ☐　No ☐ Is the revenue generated and used for transit planning, capital, or operating expenses?　Yes ☐　No ☐ 　If yes check what revenue is used for transit planning _____　capital____　operating____ 　If no what is the revenue being used for?
Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	49	**Excess Property** – Do you have any excess real property?　Yes ☐　No ☐　(if no go to #50) 　*If yes*, is there an excess real property inventory and utilization plan?　Yes ☐　No ☐ 　Do you have a copy of the plan and has the plan been updated, if necessary?　Yes ☐　No ☐　Copy of plan ☐
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Review equipment inventory and records. Review control procedures. Desk Review Are procedures sufficient to maintain control? Finding(s)	50	**Control of Vehicles** – How do you manage and maintain control over federally-funded equipment and ensure its continued use? Using the following questions: | Question	Yes	No
Do they have an equipment inventory?		
How often do they update the inventory?		
How is equipment tracked, tagged, etc.?		
Have you disposed of any equipment before its useful life? If yes did you notify ITD-PT?		
Any of the disposed equipment (in the last 2 years) valued over $5,000? If yes did you notify ITD-PT? How did you use those funds?		| *Note*: FTA defines equipment as all tangible, nonexpendable, personal property that has a service life over one year and an acquisition and installation cost of $5,000 or more per unit.

On-Site Finding(s)
 	
Corrective Action Needed?
 	
Timeline
	51	**Spare Ratio –** What is your spare ration?
		
		   Note: The Spare Ratio is number of spare vehicles divided by the number required for maximum service.
		
		   Do you have any vehicles that are too large for your needs? Yes ☐ No ☐

Date Resolved?		**ITD-PT Notes:**

MAINTENANCE

BASIC REQUIREMENT: States and their subrecipients must maintain property in good operating order and maintain ADA accessibility features.

Typical Source	? #	Question		
Inspect maintenance facilities and vehicles for general condition and cleanliness. Inspect maintenance records on selected vehicles for adherence to maintenance plan. Review written maintenance plan including inclusion of ADA features	52	Tell us how you meet minimum vehicle maintenance requirements? Does the subrecipient maintain accessibility features as required under ADA?		
		Question	Yes	No

		Are the maintenance procedures for wheelchair lifts and other accessibility equipment included in your maintenance plan and preventive maintenance check list?
		
		   ITD-PT Review to ensure in maintenance plan?
		   Do they include this in the PM Check list?		

Desk Review Finding(s)		Do maintenance records indicate regular and periodic maintenance checks for lifts? How often do you cycle the lift(s)		
On-Site Finding(s)		Do you maintenance records also include: accessibility features (e.g., kneelers, ramps, public address systems, voice annunciation systems, station elevators, etc.)?		
Corrective Action Needed?		Do maintenance records indicate that lifts and accessibility features are repaired promptly as required by the DOT ADA regulations?		
Timeline		**ITD-PT Notes:**		
Date Resolved?				

Typical Source	? #	Question
Review written maintenance plan Inspect maintenance on vehicles for general condition and cleanliness. Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline Date Resolved?	53	Vehicle Rolling Stock – *before subrecipient can apply for FTA funds they must submit a written maintenance plan on how they will manage and maintain any rolling stock.* {table below} **ITD-PT Notes:**

Question	Yes	No
Does your maintenance plan include maintenance goals and objectives		
Do the maintenance plan and the preventive maintenance checklists meet the needs of the current fleet?		
Do the maintenance plan and the preventive maintenance checklists meet the minimum manufacturers' maintenance requirements under vehicle warranty?		
How do you track the manufacturer's recommendation and updates on requirements?		

Operations

This section does not relate to a specific compliance topic; rather the questions relate to the operational efficiencies and effectiveness in the systems various operational policies. This section addresses organization and staffing, transit operations, scheduling, dispatching, customer services, operation planning, marketing, compliant management, and service evaluation.

Typical Source	? #	Question
Organization chart Job Descriptions (of all positions) - *this is submitted during application process* Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	54	The subrecipient is responsible for ensure it has the managerial and technical capacity to carry out the ITD-PT federally funded grant. The transit agency is responsible for ensuring that it has sufficient personnel assigned to the various transit functions (administration, operations, and maintenance) to ensure successful delivery of public and coordinated human services transportation. What are the direct staff commitments to the following transit functions: <table><tr><td># of Staff</td><td>Function</td><td>Comments</td></tr><tr><td></td><td>Administration</td><td></td></tr><tr><td></td><td>Operations</td><td></td></tr><tr><td></td><td>Maintenance</td><td></td></tr><tr><td></td><td>Other</td><td>Explain:</td></tr></table> What Services do you provide: Fixed Route [ ] Demand Response [ ] Volunteer [ ] *For Fixed Route go to question #55 for Demand Response go to #57* Volunteers Please describe the training program for volunteers?
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
	55	**Fixed Route Operations** (if not fixed route go to #57)
		What types of Fixed Route Services are offered?
		☐ Non-commuter bus (Traditional Fixed Routes) If checked how many vehicles? ☐
		☐ Commuter Bus – If checked how many vehicles ☐
		☐ Intercity Bus – If checked how many vehicles ☐
Desk Review Finding(s)		☐ Deviation ¾ of a mile off route – If checked how many vehicles? ☐
On-Site Finding(s)		How are operators assigned to vehicle runs?
Corrective Action Needed?		How do you ensure sufficient number of operators to run scheduled services?
Timeline		Do you have a standard for on-time fixed route operations?
		How do you measure on-time performance?
		Do you currently use software that helps with on-street supervision, and boarding's? Yes ☐ No ☐
		What is the name of the software?
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Review Employee Manual Employee files for certifications Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline	56	**Fixed Route Operations** What is the extent of operating training prior to being permitted to drive independently on a fixed route?

What is the extent of operating training prior to being permitted to drive independently on a fixed route?

Hours	Training Component	Comments
	Classroom Training	
	Behind the Wheel Training	

What components make up the operator's training:

Yes	No	Check if Apply	Verify Training records for history
		Agency Policies and Procedures	
		Defensive Driving	
		Passenger Relations	
		Accident Procedures	
		Evacuation and Emergency procedures	
		Behind the wheel orientation	
		Ada Requirements	
		Customer Service	
		Other (specify)	
		Other (specify)	
		Other (specify)	

What are the maximum time limits on work hours (spread time) for bus operators imposed by the transit system?

Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
Review Employee Manual	57	**Demand Response Operations**

Demand Response Operations

What modes of demand response services are operated?

Yes	No	Check if Apply
		Ada Complementary Paratransit
		Route/point deviation with deviations for general public
		Other demand response service such as (AMR schedule etc…)

What is the maximum number of vehicles used in demand response services? [   ]

What is the extent of operating training prior to being permitted to drive independently on a demand response route?

Hours	Training Component	Comments
	Classroom Training	
	Behind the Wheel Training	

What components make up the operator's training:

Yes	No	Check if Apply	Verify Training records for history
		Agency Policies and Procedures	
		Defensive Driving	
		Passenger Relations	
		Accident Procedures	
		Evacuation and Emergency procedures	
		Behind the wheel orientation	
		Ada Requirements	
		Customer Service	
		Other (specify)	
		Other (specify)	
		Other (specify)	

What are the maximum time limits on work hours (spread time) for bus operators imposed by the transit system?

Left column labels: Desk Review Finding(s); On-Site Finding(s); Corrective Action Needed?; Timeline

| Date Resolved? | | **ITD-PT Notes:** |

Typical Source	? #	Question			
Review Employee Manual	**58**	**Scheduling:**			
		Yes	No	Question	Comments
				Do you have a dedicated phone line for the transit reservations?	
				How are callers greeted? Example standard script	
				Does the greeting connote public transportation (rather than an agency) service?	
				Does the system record all requests for services (even if the trip request is not scheduled)?	
Desk Review Finding(s)				Do you record all denied requests for services and the reason?	

What are the hours and days in which the system accepts telephone reservations?

What is the capacity of your phone system? # of phone lines [   ]   Number of dedicated reservationists [   ]

What happens when the reservation phone line is busy?

How are reservations accepted? Example: slip of paper, recorded on a board, entered into a software schedule system

When are schedules developed?

Who is responsible for the schedule?

 How are schedules communicated to drivers?

 Is there special training required to do scheduling duties?

On-Site Finding(s)

Corrective Action Needed?

Timeline

Date Resolved?	**ITD-PT Notes:**

Typical Source	? #	Question			
Review Employee Manual	59	**Dispatching** is the process of controlling the movement of revenue vehicles. This includes on-going communication with vehicles in revenue service, ensuring that schedules are being operated on-time, responding to real-time conditions such as traffic delays and vehicle break-downs, and providing guidance to revenue vehicles in emergency situations.			
		Yes	No	Question	Comments
				Does the transit system have a dedicated dispatch function? If Yes what are the hours of operations for system dispatching?	
Desk Review Finding(s)				Does dispatch operate during all hours when vehicles are in revenue service?	
		What method of communication is used between dispatch and drivers?			
On-Site Finding(s)				Cell Phone	
				Two-way radio	
				Mobil data terminals – tough pad etc..	
Corrective Action Needed?				Other (specify)	
				Do you have a written procedure for various operating scenarios such as break-down, accident etc. that is used by dispatch personnel to handle emergency situations	
Timeline				Does dispatch personnel undergone any special training appropriate to duties? If yes what is the training?	
Date Resolved?		**ITD-PT Notes:**			

SAFETY AND SECURITY

BASIC REQUIREMENT: Recipients must also report transit safety data annually through NTD.   In addition, subrecipients are required to operate services in a safe and secure manner.

Under the safety authority provisions of the Federal transit laws, the Secretary has the authority to investigate the operations of the grantee for any conditions that appear to create a serious hazard of death or injury, especially to patrons of the transit service. Under security, a list of 17 Security and Emergency Management Action Items has been developed by FTA and the Department of Homeland Security's Transportation Security Administration (TSA). This list of 17 items, an update to the original FTA Top 20 security action items list, was developed in consultation with the public transportation industry through the Mass Transit Sector Coordinating Council, for which the American Public Transportation Association (APTA) serves as Executive Chair. Security and Emergency Management Action Items for Transit Agencies aim to elevate security readiness throughout the public transportation industry by establishing baseline measures that transit agencies should employ.

Suggested System Safety Program Plan (SSPP) Plan Elements:

Include policy statements, reference other documents or simply state the process that will be used to fulfill the purpose of the element. The System Safety Program Plan Resource Manual should include policies, procedures and descriptions of the Element content for most of the Elements.

Training & Certifications Review/Audit
    Driver/Employee Selections (addressed in ABC Transit HR Manual
    Drug & Alcohol Abuse Program: includes Drug Free Work Policy, Testing program

Security
It is the policy of ABS Transit to maintain the security of all passengers and employees through use of preventive measures based upon an assessment of threats and vulnerabilities of the system and its facilities. ABC security plan can be found in (what manual). The Security Manual includes a description of security measures, employee training and procedures that have been implemented to maintain a secure environment. This training manual is reviewed by employees each year and signed and dated that they have read and understand.

Typical Source	? #	Question		
If have SSPP Manual review	60	Safety and Security – for 5311 Subrecipients the following questions are **suggested** to be in a Safety, Security and Emergency plan.		
		Question	**Yes**	**No**
		Do you currently have a SSPP Plan? (if no discuss why you should and use Suggested System Safety Program Plan (SSPP) Plan Elements on page 47		
		Have you submitted transit safety data in NTD for the past year in a timely manner?		
		Do you have a process to ensure that security threats, concerns and incidents are reported appropriately?		
		Do you have a written policy on safety?		
Desk Review Finding(s)		Do you have a written system safety program plan (SSPP) for your transit service?		
		Does the SSPP address management of the safety function?		
		Are there staff safety personnel?		
		How is the safety function managed?		
On-Site Finding(s)				
Corrective Action Needed?	61	**Security and Emergency Plan:**		
		Question	**Yes**	**No**
		Do you have a written security and emergency management plan for all modes of operation?		
Timeline		Do the security and emergency management plans define roles and responsibilities for transit personnel?		
		Do the security and emergency management plans ensure that operations and maintenance supervisors, forepersons, and managers are held accountable for security issues under their control?		
		Have you established a security and emergency training program?		
Date Resolved?		**ITD-PT Notes:**		

Typical Source	? #	Question
Review Safety Manual or where subrecipient has this process Visit with the person who is responsible for this and walk through process.	62	**Safety Incident Investigation Procedures** What are the investigation procedures for minor/major incidents? What circumstances and conditions determine which incidents will be investigated?
Desk Review Finding(s)		Who does the investigation? Are they certified or trained? Yes ☐ No ☐ How often is this person certified or trained?
On-Site Finding(s)		To whom do reports go?
Corrective Action Needed?		What follow-up action is taken and by whom? What key safety issues have been identified and how are they being addressed?
Timeline		Is there a process for hazard identification and resolution? When corrective action is needed, how is it initiated and followed up?
Date Resolved?		**ITD-PT Notes:**

Typical Source	? #	Question
• training program for drivers, mechanics, supervisors, and other line personnel • job descriptions / requirements for safety sensitive positions and supervisory personnel • training records of its employees • training manuals • safety handouts • safety postings Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline Date Resolved?	63	**Safety Accountability**

Questions	Yes	No
Does management hold line personnel accountable for safety?		
Do line personnel job descriptions (senior level to first-line supervisors) include a provision for safety accountability?		
Are safety responsibilities clearly defined?		
Do annual evaluations include an appraisal of safety performance?		
Is there safety training for employees performing safety sensitive functions?		
Who performs the training?		
Do supervisors receive formal safety training?		
How do you establish safety accountability training?		

ITD-PT Notes:

Other suggested Safety Accountability recommendations:

- **Protocols to Respond to DHS Advisory System Threat Levels** - Have protocols been established to respond to the Department of Homeland Security Advisory System Threat Levels?
- **Public Awareness Materials -** Have public awareness materials been developed and distributed on a system-wide basis?
- **Tabletop Drills -** Are tabletop and functional drills conducted at least once every six months, and are full-scale exercises, coordinated with regional emergency response providers, performed at least annually?
- **Risk Management Process -** Has the subrecipient established a risk management process to assess and manage threats, vulnerabilities and consequences?
    - Did the process identify mitigation measures after the risk assessment had been completed?
- **Information Sharing Networks -** Does the subrecipient participate in information sharing networks such as the FBI's Joint Terrorism Task Force (JTTF) or other regional anti-terrorism task force and/or the Public Transportation Intelligence Sharing & Analysis Center (PT-ISAC)?
- **Hiring Practices -** Have background investigations been conducted on all new front-line operations and maintenance employees?
- **Facility Security -** Are ID badges used for all visitors, employees, and contractors to control access to key critical facilities? __ yes __ no
    - Has the subrecipient conducted a physical inspection of facilities to ensure that access is controlled and that facilities are secure?
- Security Audits - Has the subrecipient conducted periodic audits of security policies and procedures?

Capital Asset(s)

Capital Assets are tangible items with a purchase price of $5,000 or more, and a useful life of at least one year.
Capital assets include the following examples:

- ✓ Rolling Stock (all vehicles used for passenger transport)

- ✓ Vehicles that are not used for passenger transportation, such as maintenance and staff vehicles.

- ✓ Shop Equipment (fixed or mobile vehicle maintenance equipment)

- ✓ Office Equipment (including office computer servers, person computer (PCs), copiers, and other large office equipment

- ✓ Communications Equipment (includes telephone systems, and radio systems when the purchase is $5,000 or more)

- ✓ Security/Surveillance Equipment (includes security systems such as lighting, cameras and recording equipment – for installation at a facility or in vehicles)

- ✓ Passenger Shelters and Signage

- ✓ Buildings and Facilities (such as bus barns, maintenance shops, or transit centers)

Typical Source	? #	Question
• Look at the building, note anything that makes you notice use for other purpose. • Ask other employees what all the building is used for. Desk Review Finding(s) On-Site Finding(s) Corrective Action Needed? Timeline Date Resolved?	64	**Facility Assets** _see table below_ **ITD-PT Notes:**

Facility Assets

Questions	Yes	No
Is the facility being used for the original authorized purpose?		
Is there any "incidental use" of the facility? (If yes explain)		
Is the facility needed, or is there excess available capacity?		

Facility Inspection

Facility Interior	YES	NO	N/A	COMMENTS
Is the facility ADA accessible?				
Are interior lights in working order?				
Is flooring in good condition?				
Are workspaces clean?				
Do customers have seating in waiting areas and are there any damages in waiting areas?				
Have trash receptacles been emptied?				
Is there any graffiti on interior of structure?				
Is there any visual damage to office or work area?				
Electrical Systems:				
Are all electrical panels secured?				
Have all electrical circuits been identified?				
Are all electrical switches and receptacles in good repair?				
Have Ground Fault Interrupter's been provided on circuits in proximity to water?				
Is there a "lock-out" procedure in place?				
Heating System:	YES	NO	N/A	COMMENTS
Is a 3' clearance provided around all heating equipment?				
Are furnace/boiler rooms kept locked?				
Are furnace/boiler rooms free from combustible storage?				
PM Schedule updated				
Has the unit been serviced regularly				
Has the filter been changed and clean?				
Has the unit been cleaned?				
Are the thermostats in good working order?				

Heating System –continued-:	YES	NO	N/A	COMMENTS
Check pipes or lines for leakage of fluids. Repair if needed.				
Check electrical supply for damage. Repair if needed.				
Are residents reminded to keep combustibles away from heaters?				

Air Conditioning	YES	NO	N/A	COMMENTS
PM Schedule updated				
Has the unit been serviced regularly				
Has the filter been changed and clean?				
Has the unit been cleaned?				
Are the thermostats in good working order?				
Are vents clean?				
Check pipes or lines for leakage of fluids. Repair if needed.				
Check electrical supply for damage. Repair if needed.				

Private Protection:	YES	NO	N/A	COMMENTS
Is building equipped with an automatic sprinkler system? If so, continue.				
Is the main sprinkler control valve accessible?				
Are all valves supplying water or air to the system open?				
Is system operation monitored by an alarm company?				
Is valve operation monitored by an alarm company?				

Private Protection – continued-:	YES	NO	N/A	COMMENTS
Is the sprinkler system tested on a quarterly basis and documented?				
Is the building equipped with a fire detection system? If so, continue.				
Does the system protect the entire building?				
Does the system provide an alarm signal in the building?				
Is system tested on a monthly basis and documented?				
Is the main alarm panel in normal operating condition?				
Are portable fire extinguishers provided?				
Are all extinguishers inspected on a monthly basis and documented?				
Do all extinguishers have a current inspection tag?				
Emergency Evacuation:	YES	NO	N/A	COMMENTS
Are all exits and travel paths identified with illuminated "EXIT" signs?				
Are travel paths leading to exits free of obstructions?				
Are exits unlocked and operational?				
Are working emergency lights provided in the building?				
Are emergency lights tested periodically and documented?				
Are evacuation diagrams posted throughout the building?				

Facility Exterior	YES	NO	N/A	COMMENTS
Is the building address or identification clearly visible?				
Is the facility ADA accessible?				
Are exterior lights in working order?				
Are the exits onto public streets free from visibility obstructions?				
Are all building sides accessible to emergency equipment?				
Does the building appear to be in good repair?				
Are exterior walls free from cracks or other damages?				
Are windows free from cracks or broken panes?				
Are paved surfaces inspected and repaired (i.e., lifts, cracks, etc.)?				
Are stairs, landings and handrails in good repair and fastened securely? (inspect the bottom of each step)				
Are facilities periodically inspected and documented?				
Are all sewer clean out caps in place?				
Are all irrigation covers in place?				
Do entrance doors close slowly to avoid hazards to fingers?				
Is there any graffiti on exterior of facility?				

Structural Condition

Roof	YES	NO	N/A	COMMENTS
Looking at the roof is there any debris				
Drainage (any evidence of standing water)				
Roof show any signs of coating such as punctures, cracks, blisters?				
If a slopped roof Show any signs of buckle, curled, missing shingles etc…				
Underside of overhang/roof any damage				
Gutters/Drains – are they in good shape				
Condition of Skylights				
Condition of Chimneys or vents				
Vents				
Ceiling	YES	NO	N/A	COMMENTS
Any cracks, water stain or water leaks				
Exterior Walls	YES	NO	N/A	COMMENTS
Any deformed finish, surface deterioration or staining of exterior walls?				
Interior Walls, Windows, Doors	YES	NO	N/A	COMMENTS
Any cracks, water stain, leak, deformed finish?				
Windows leaks				
Door/Window Alignments				
Plumbing	YES	NO	N/A	COMMENTS
Any sign of leaks in exposed pipes, area where pipes run through the walls or foundations				
Any sign of corrosion				
Water pressure – any issues with pressure?				

Plumbing – continued-	YES	NO	N/A	COMMENTS
How do drain speed look – if slow could be sign of blocked draining				
Flush toilets make sure they operate properly. Look for continued running or leaks. Look for cracks, or leaks around toilets				
Look at sinks and condition of the bathroom or kitchen area for cracked tiles, back-board behind sinks for any deteriorating. Leaking of faucets etc.				
Water heater – look for rust flakes, check the flame if should be an even blue. (no yellow should be seen if yellow in color could indicate soot or problem with the gas-air mix and mean jets need cleaning				
How often do you drain the water heater?				
Is the water heater on a maintenance plan?				
ITD-PT review maintenance plan of the building and note any comments, suggestions that subrecipient needs to make changes to.				
Date of facility inspection				
Name of the ITD-PT Grants Officer who inspected the building				